

**UNITED STATES DISTRICT COURT**  
**FOR THE SOUTHERN DISTRICT OF NEW YORK**

ARLENE J. DELGADO,  
Plaintiff,

-vs-

No. 19-cv-11764 (AT) (KHP)

DONALD J. TRUMP FOR PRESIDENT, INC.,  
TRUMP FOR AMERICA, INC., SEAN SPICER,  
individually, REINCE PRIEBUS, individually,  
and STEPHEN BANNON, individually,

Defendants.

**PLAINTIFF'S REQUEST**

Plaintiff, Arlene J. Delgado, hereby requests, pursuant to the Court's June 28, 2024 Order (ECF 371), as follows:

The Court's June 28th Order (#371) addresses various Requests to Admit by the Plaintiff, including but not limited the following two Requests for Admit:

*RFA 5: Admit that you cannot produce a document, email, or communication reflecting who made the decision to not provide Plaintiff with a White House job;*

*RFA 6: Admit that you cannot produce a document, email, or communication reflecting the reasons behind the decision to not provide Plaintiff with a White House job.*

The Order reads (p. 15-16) that Plaintiff need not seek this information via an RFA but rather, if Plaintiff asked for such (which Plaintiff did – e.g., in Requests for Production), “Defendants should have (1) produced such documents; (2) stated that they were not able to locate responsive documents after a reasonable search; or (3) stated they were withholding responsive documents pursuant to a specified objection.” The Order then states that if no such documents have been produced (and they have not): “she may ask Defense counsel to confirm in writing that no such documents were located after a reasonable search....Plaintiff may make this inquiry within the next 7 days, and Defendants must answer the inquiry within 7 days thereafter.” Plaintiff herein makes the request and requests that Defendants/Defense counsel provide such documents (referenced in above RFA 5 and 6). If not, Plaintiff requests that Defendants admit that no documents were located after a reasonable search.

DATED: July 5, 2024  
s/Arlene Delgado  
Arlene Delgado